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Clerk
District Court

MAR 30 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

ALAN STUART MARKOFF, D.D.S.dba
TOOTHWORKS and OPEN CHOICE,

Plaintiff,

vs.

TODD KEITH JOHNSON, D.D.S.

Defendant.

CIVIL ACTION NO. CV-05-0035

**PRE-DISCOVERY
DISCLOSURE STATEMENT**

Date: April 13, 2006
Time: 9:30 a.m

Pursuant to Local Rule 16.2CJ (d). and Rule 26(a) of the Federal Rules of Civil Procedure, Plaintiff provides to Defendant the following:

1. PERSONS WITH DISCOVERABLE INFORMATION

a. Dr. Alan Stuart Markoff
Toothworks and Open Choice
PO Box 504699
Saipan MP 96950

b. Dr. Todd Johnson
1041 Nw 71ST Place
Oklahoma City, OK 73116

c. Ms. Angelina Mamaril. Former accountant of Todd Johnson in Toothworks and Open Choice. Ms. Mamaril upon information and belief, still resides in Saipan, CNMI. Plaintiff reserves the right to supplement this disclosure for her address and contact number at a later time.

1 d. Ms. Flor Urena. Former accountant of Todd Johnson in Toothworks and
2 Open Choice. Ms. Urena upon information and belief, still resides in Saipan, CNMI.
3 Plaintiff reserves the right to supplement this disclosure for her address and contact number
4 at a later time.

5 c. Carol Galanza
6 Assistant to Dr. Markoff
7 c/o PO Box 504699
8 Saipan MP 96950

9 d. Delgadina Sablan
10 Office Manager
11 Toothworks
12 PO Box 504699
13 Saipan MP 96950

14 e. Magliari & Company, CPA'S
15 PMB 297 Box 10000
16 Saipan MP 96950
17 Tel 233-1837

18 f. John Sheather
19 Bank of Hawaii
20 Puerto Rico
21 Saipan MP 96950

22 g. Victoria Concepcion
23 First Hawaiian Bank
24 Beach Road, Oleai
25 Saipan MP 96950

26 h. Merced Tomokane
27 Bank of Guam
28 Beach Road, Garapan
Saipan MP 96950

i. Louis Lerner
Accountant of Dr. Markoff
Houston, Texas

2. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENT

a. Agreement for the Purchase and Sale of Dental Practice between Dr. Todd Johnson, D.D.S. and Dr. Alan S. Markoff, D.D.S.

b. Consulting Agreement between Dr. Alan Markoff, D.D.S. and Dr. Todd Johnson, D.D.S.

c. Financial Documents submitted by Dr. Todd Johnson, D.D.S. to Dr. Alan S. Markoff prior to the sale of Toothworks and Open Choice, including but not limited to Balance Sheet, Income Statement, Bank Account Statements, Tax Documents, Collection Report, Profit/Loss Analysis and Tax Return Analysis.

1 d. Correspondence relevant to the allegations in this case.

2 e. Any expert report(s).

3 Plaintiff reserves the right to supplement this disclosure at a later time. All documents
4 relevant to the allegations contained in the complaint will be available at counsel's office.

5 3. COMPUTATION OF DAMAGES.

6 Damages have not been fully computed at this time. Plaintiff reserves the right to
7 submit specific damage computation and supporting documentation at a later time.

8 RESPECTFULLY SUBMITTED.

9 Date: March 30, 2006



10 MARK K. WILLIAMS
11 Attorney for Plaintiff
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